

DOCKET 7535
Appendix to the Proposal for Decision

As explained in the Proposal for Decision (see p. 55), the data points contained in this Appendix have been derived from the evidentiary record in order to illustrate the impacts of requiring Vermont electric utilities other than Central Vermont Public Service Corporation ("CVPS") and Green Mountain Power Corporation ("GMP") to implement the low-income rate program proposed by AARP. Neither the enumerated paragraphs nor the record citations in this Appendix are intended to constitute proposed findings of facts pursuant to 30 V.S.A. § 8(c).

I. City of Burlington Electric Department ("BED")

1. In 2008, BED on average served a total of 19,967 customers: 16,273 (81%) residential; 2,856 (14%) small commercial, 825 (4%) large-scale commercial and 13 (less than 1%) large-scale, primary service customers. Exh. Amended Board-1 at 2.

2. For the year 2008, BED collected revenues totaling \$44,524,162: 27% (\$12,389,374) from residential; 7% (\$2,950,840) from small commercial; 49% (\$21,598,720) from large-scale commercial; 17% (\$7,585,228) from large-scale primary service. Exh. Amended Board-1 at 2.

3. BED has a large percentage of the state's low-income households, a smaller customer base and a less favorable mix of classes of ratepayers than CVPS and GMP for purposes of equitably spreading the cost of funding a low-income rate program. Taormina pf. at 16-17.

4. Approximately 27%¹ of BED's residential customers subsist on income that is at or below 150% FPL. Exh. Amended Board-1 at 1.

5. Based on annualized revenue data from 2008, BED revenues raised from the monthly meter charges in the AARP Proposal would total approximately \$1,216,594: \$292,914 from residential customers (24%); \$85,680 from small-scale commercial and industrial customers (7%); \$825,000 from large-scale commercial customers (68%); and \$13,000 from large-scale primary service customers (1%). Exh. Amended Board-1 at 2.

6. Assuming a program administration cost of 10% of total electric rate discounts provided, BED's program administration cost in the first year would range from \$25,175.79 (assuming 30% participation) to \$83,919.30 (assuming 100% participation). Exh. Amended Board-1 at 1.

1. $(4,409/16,273 = 27\%)$.

7. The total annual revenues raised from the monthly meter charges of \$1,216,594 would be enough (1) to fund a 25% electricity block rate discount and to retire arrearages for in excess of 100% of BED's program-eligible customers during the first year of the program at a cost of \$1,167,074, and (2) to fund a 25% electricity block rate discount for in excess of 100% of BED's program-eligible customers in the years thereafter at an annual cost of \$923,112. Exh. Amended Board-1 at 1.

8. There are an estimated 4,409 program-eligible customers in BED's service territory. Assuming a program participation rate of 30%, implementing the AARP Proposal in BED's service territory would be enough to provide rate relief for 1,323 eligible customers at a cost of \$350,122 in the first year, and \$276,933 in the years thereafter. Exh. Amended Board-1 at 1.

9. Using the design principles from the AARP Proposal, the BED rate classes charged with funding the low-income rates would see rate increases in the following range: 0.17% (large-scale primary service); 2.36% (residential); 2.90% (small-scale commercial); 3.82% (large-scale commercial). Exh. Amended Board-1 at 2.

10. The cumulative rate impact of the AARP Proposal on BED's ratepayers would be a rate increase of 2.73%. Exh. Amended Board-1 at 2.

II. Town of Stowe Electric Department ("Stowe")

11. In 2008, Stowe served 3,822 customers: 3,144 residential customers (82%); 635 light commercial² customers (17%); and 43 commercial customers (1%). Exh. Amended Board-2 at 6.

12. For the year 2008, Stowe collected revenues totaling \$9,424,320³: \$3,460,426 (37%) from residential customers; \$1,405,062 (15%) from light commercial customers; \$4,558,832 (48%) from commercial customers. Exh. Amended-Board-2 at 6.

13. Based on annualized revenue data from 2008, Stowe's revenues raised from the monthly

2. Defined as customers with usage less than 12,000 kWh per month. In turn, the commercial class consists of customers with usage at 12,000 kWh per month or above. Exh. Amended Board-2 at 6.

3. This total is given as \$10,102,502.00 in exh. Amended Board-2 at 6. However, the correct total is \$9,424,320. A mathematical error accounts for the \$678,182 discrepancy between the two totals.

meter charges in the AARP Proposal would total \$118,642: \$56,592 (48%) from residential customers; \$19,050 (16%) from light commercial customers; and \$43,000 (36%) from industrial customers. Exh. Amended-Board-2 at 6.

14. The total annual revenues raised from the monthly meter charges of \$118,642 would be enough (1) to fund a 25% electricity block rate discount and to retire arrearages for in excess of 100% of Stowe's program-eligible customers during the first year of the program at a cost of \$67,613⁴, and (2) to fund in excess of 100% of Stowe's program-eligible customers in subsequent years at an annual cost of \$38,137. A 30% participation rate would cost Stowe \$20,344 during the first year of the program and \$11,501 in the years thereafter. Exh. Amended Board-2 at 5.

15. There are an estimated 126 program-eligible customers in Stowe's service territory. Assuming a program participation rate of 30%, implementing the meter charges in the AARP Proposal in Stowe's service territory would raise sufficient revenue to provide a 25% electricity block rate discount for 38 eligible customers at a cost of \$10,456 per year. Exh. Amended Board-2 at 3 and 5.

16. Assuming a program administration cost of 10% of total electric rate discounts provided, Stowe's estimated program administration cost in the first year would range from \$1,046 (assuming 30% participation) to \$3,467 (assuming 100% participation). Exh. Amended Board-2 at 5.

17. Using the design principles from the AARP Proposal, Stowe's funding rate classes would see rate increases as follows: 0.94% (commercial); 1.36% (light commercial) to 1.64% (residential). Exh. Amended Board-2 at 6.

18. The cumulative rate impact of the AARP Proposal on Stowe's ratepayers would be a rate increase of 1.17%. Exh. Amended Board-2 at 6.

4. The total given in exh. Amended Board-2 at page 5 for the total cost of discounts in year 1 of the program is \$151,693.62. However, the correct total is \$67,613.67. A mathematical error accounts for the discrepancy between the two totals.

III. Group of Municipal Electric Utilities ("GMEU")

GMEU-Barton Village, Inc. Electric Department ("Barton")

19. In 2008, Barton served a total of 2,127 customers: 1,946 (93%) residential customers; and 181 (7%) small commercial customers. Barton has no industrial customers. Exh. GMEU-1 at 2.

20. For the year 2008, Barton collected revenues totaling \$2,046,964: \$1,564,357 (76%) from residential customers and \$482,607 (24%) from small commercial customers. Exh. GMEU-1 at 2.

21. In 2008, the average annual adjusted gross income reported by residents in Orleans County, where Barton's service territory is located, was below \$24,281 — the Vermont average adjusted gross income as determined by the Vermont Department of Taxes. Exh. VEC-Pratt.1.

22. Of Barton's residential customers, 30% would be eligible for program assistance. Exh. GMEU-1 at 1.

23. Based on annualized revenue data from 2008, Barton's revenues raised from the monthly meter charges in the AARP Proposal would total approximately \$40,458⁵: \$35,028 (87%) from residential customers and \$5,430 (13%) from small commercial customers. Exh. GMEU-1 at 2.

24. The \$40,458 in total annual revenues raised from the monthly meter charges are projected to be enough to fund a 25% electricity block rate discount and to retire arrearages for at least 20% (\$30,141) — but not enough for 30% (\$45,212) — of Barton's program-eligible customers during the first year of the program. In the years thereafter, assuming a 30% participation rate, the total meter charge revenues would suffice to fund a 25% electricity block rate discount at an annual cost of \$38,717. Exh. GMEU-1 at 1.

25. Assuming a program participation rate of 30%, implementing the meter charges in the AARP Proposal in Barton's service territory would generate sufficient revenue to provide a 25% electricity block rate discount for 175 eligible customers at a cost of \$35,198 per year. Exh. GMEU-1 at 1.

5. This total revenue figure was not provided in exh. GMEU-1 at 2. Rather, it represents a simple addition of the sums stated in the exhibit for Barton's individual rate classes. This simple addition was also performed to derive a total revenue figure for the following other utilities: Enosburg, Hardwick, Hyde Park, Jacksonville, Johnson, Ludlow, Lyndonville, Morrisville, Northfield, Orleans, Readsboro and Swanton.

26. Assuming a program administration cost of 10% of total electric rate discounts provided, Barton's estimated program administration cost in the first year would range from \$3,519 (assuming 30% participation) to \$11,732 (assuming 100% participation). Exh. GMEU-1 at 1.

27. Using the design principles from the AARP Proposal, the Barton rate classes charged with funding the low-income rates would see rate increases ranging from 1.13% (small commercial) to 2.24% (residential). Exh. GMEU-1 at 2; ¶23 note 5, above.

28. The cumulative rate impact of the AARP Proposal on Barton's ratepayers would be a rate increase of 1.98%. Exh. GMEU-1 at 2.⁶

GMEU- Village of Enosburg Falls Water & Light Department ("Enosburg")

29. In 2008, Enosburg served 1,586 customers: 1,448 (92%) residential customers; 115 (7%) commercial customers; and 23 (1%) industrial customers. Exh. GMEU-1 at 4.

30. For the year 2008, Enosburg collected revenues totaling \$3,316,425: \$1,936,401 (58%) from residential customers; \$251,847 (8%) from commercial customers; and \$1,128,177 (34%) from industrial customers. Exh. GMEU-1 at 4.

31. In 2008, the average annual adjusted gross income reported by residents in Franklin County, where Enosburg's service territory is located, was below \$24,281 — the Vermont average adjusted gross income as determined by the Vermont Department of Taxes. Exh. VEC-Pratt-1.

32. Of Enosburg's residential customers, 22% would be eligible for program assistance. Exh. GMEU-1 at 3.

33. Based on annualized revenue data from 2008, Enosburg's revenues raised from the monthly meter charges in the AARP Proposal would total approximately \$52,514: \$26,064 (50%) from residential customers; \$3,450 (6%) from commercial customers; and \$23,000 (44%) from industrial customers. Exh. GMEU-1 at 4; ¶ 23 note 5, above.

6. This total rate impact percentage was not provided in exh. GMEU-1 at 2. Rather, it was calculated as follows: $\$40,458 / \$2,046,964 = 1.98\%$. This calculation was also performed to derive a total rate impact percentage for the following utilities: Enosburg, Hardwick, Hyde Park, Jacksonville, Johnson, Ludlow, Lyndonville, Morrisville, Northfield, Orleans, Readsboro and Swanton.

34. The \$52,514 in total annual revenues raised from the monthly meter charges would be enough (1) to fund a 25% electricity block rate discount and to retire arrearages for at least 30% of Enosburg's program-eligible customers during the first year of the program at a cost of \$41,301 and (2) to fund a 25% electricity block rate discount for in excess of 40% of Enosburg's program-eligible customers in subsequent years at an annual cost of \$46,861. Exh. GMEU-1 at 3.

35. Assuming a program participation rate of 30%, implementing the meter charges in the AARP Proposal in Enosburg's service territory would generate sufficient revenue to provide a 25% electricity block rate discount for 96 eligible customers at a cost of \$31,950 per year. Exh. GMEU-1 at 3.

36. Assuming a program administration cost of 10% of total electric rate discounts provided, Enosburg's estimated program administration cost in the first year would range from \$3,195 (assuming 30% participation) to \$10,650 (assuming 100% participation). Exh. GMEU-1 at 3.

37. Using the design principles from the AARP Proposal, the Enosburg rate classes charged with funding the low-income rates would see rate increases as follows: 1.35% (residential); 1.37% (commercial); 2.04% (industrial). Exh. GMEU-1 at 4.

38. The cumulative rate impact of the AARP Proposal on Enosburg's ratepayers would be a rate increase of 1.58%. Exh. GMEU-1 at 4; ¶ 28 note 6, above.

GMEU-Town of Hardwick Electric Department ("Hardwick")

39. In 2008, Hardwick served 4,244 customers: 3,856 (91%) residential; 365 (8.600%) commercial; 23 (0.5%) industrial. Exh. GMEU-1 at 6.

40. For the year 2008, Hardwick collected revenues totaling \$5,196,242: \$3,792,029 (73%) from residential customers; \$752,896 (14%) from commercial customers; and \$651,317 (13%) from industrial customers. Exh. GMEU-1 at 6.

41. In 2008, the average annual adjusted gross income reported by residents in the Counties

of Lamoille, Caledonia and Orleans, which constitute three of the four⁷ counties where Hardwick's service territory is located, was below \$24,281 — the Vermont average adjusted gross income as determined by the Vermont Department of Taxes. Exh. VEC-Pratt-1.

42. Of Hardwick's residential customers, 23% would be eligible for program assistance. Exh. GMEU-1 at 5.

43. Based on annualized revenue data from 2008, Hardwick's revenues raised from the monthly meter charges in the AARP Proposal would total approximately \$103,358: \$69,408 (67%) from residential customers; \$10,950 (11%) from commercial customers; and \$23,000 (22%) from industrial customers. Exh. GMEU-1 at 6; ¶ 23 note 5, above.

44. The \$103,358 in total annual revenues raised from the monthly meter charges would be enough to fund a 25% electricity block rate discount and to retire arrearages for at least 30% of Hardwick's program-eligible customers during the first year of the program at a cost of \$96,310, and (2) to fund a 25% electricity block rate discount for in excess of 40% of Hardwick's program-eligible customers in subsequent years at an annual cost of \$95,938. Exh. GMEU-1 at 5.

45. Assuming a program participation rate of 30%, implementing the meter charges in the AARP Proposal in Hardwick's service territory would raise sufficient revenue to provide a 25% electricity block rate discount for 266 eligible customers at a cost of \$65,412 per year. Exh. GMEU-1 at 5.

46. Assuming a program administration cost of 10% of total electric rate discounts provided, Hardwick's program administration cost in the first year would range from \$6,541 (assuming 30% participation) to \$21,804 (assuming 100% participation). Exh. GMEU-1 at 5.

47. Using the design principles from the AARP Proposal, the Hardwick rate classes charged with funding the low-income rates would see rate increases as follows: 1.45% (commercial); 1.83% (residential); and 3.53% (industrial). Exh. GMEU-1 at 6.

48. The cumulative rate impact of the AARP Proposal on Hardwick's ratepayers would be a rate increase of 1.98%. Exh. GMEU-1 at 6; ¶ 28 note 6, above.

7. The fourth is Washington County.

GMEU- Village of Hyde Park Electric Department ("Hyde Park")

49. In 2008, Hyde Park served 1,273 customers: 1,156 (91%) residential customers, as well as 117 (9%) commercial customers. Hyde Park served no industrial customers. Exh. GMEU-1 at 8.

50. For the year 2008, Hyde Park collected revenues totaling \$1,635,778: \$1,205,479 (74%) from residential customers and \$430,299 (26%) from commercial customers. Exh. GMEU-1 at 8.

51. In 2008, the average annual adjusted gross income reported by residents in Lamoille County, where Hyde Park's service territory is located, was below \$24,281 — the Vermont average adjusted gross income as determined by the Vermont Department of Taxes. Exh. VEC-Pratt-1.

52. Of Hyde Park's residential customers, 16% would be eligible for program assistance. Exh. GMEU-1 at 7.

53. Based on annualized revenue data from 2008, Hyde Park's revenues raised from the monthly meter charges in the AARP Proposal would total approximately \$24,318: \$20,808 (86%) from residential customers and \$3,510 (14%) from commercial customers. Exh. GMEU-1 at 8; ¶ 23 note 5, above.

54. The \$24,318 in total annual revenues raised from the monthly meter charge would be enough to fund a 25% electricity block rate discount and to retire arrearages for at least 20% (\$17,553) — but not enough for 30% (\$26,329) — of Hyde Park's program-eligible customers during the first year of the program. In the years thereafter, the meter charge revenues would suffice to fund a 25% electricity block rate discount for in excess of 40% of Hyde Park's program-eligible customers at an annual cost of \$21,216. Exh. GMEU-1 at 7.

55. Assuming a program participation rate of 30%, implementing the meter charges in the AARP Proposal in Hyde Park's service territory would raise sufficient revenue to provide a 25% electricity block rate discount for 55 eligible customers at a cost of \$14,466 per year. Exh. GMEU-1 at 7.

56. Assuming a program administration cost of 10% of total electric rate discounts provided, Hyde Park's estimated program administration cost in the first year would range from

\$1,446 (assuming 30% participation) to a maximum of \$4,822 (assuming 100% participation).
Exh. GMEU-1 at 7.

57. Using the design principles from the AARP Proposal, the Hyde Park rate classes charged with funding the low-income rates would see rate increases ranging from 0.82% (commercial) to 1.73% (residential). Exh. GMEU-1 at 8.

58. The cumulative rate impact of the AARP Proposal on Hyde Park's ratepayers would be a rate increase of 1.48%. Exh. GMEU-1 at 8; ¶ 28 note 6.

GMEU- Village of Jacksonville Electric Company ("Jacksonville")

59. In 2008, Jacksonville served 697 customers: 642 (92%) residential customers; 50 (7%) commercial customers; 5 (1%) industrial customers. Exh. GMEU-1 at 10.

60. For the year 2008, Jacksonville collected revenues totaling \$754,569: \$525,372 (70%) from residential customers; \$90,032 (12%) from commercial customers; and \$139,165 (18%) from industrial customers. Exh. GMEU-1 at 10.

61. In 2008, the average annual income reported by residents in Windham County, which is where Jacksonville's service territory is located, was below \$24,281 — the Vermont average adjusted gross income as determined by the Vermont Department of Taxes. Exh. VEC-Pratt-1.

62. Of Jacksonville's residential customers, 18% would be eligible for program assistance. Exh. GMEU-1 at 9.

63. Based on annualized revenue data from 2008, Jacksonville's revenues raised from the monthly meter charges in the AARP Proposal would total approximately \$18,056: \$11,556 (64%) from residential customers; \$1,500 (8%) from commercial customers; and \$5,000 (28%) from industrial customers. Exh. GMEU-1 at 10; ¶ 23 note 5, above.

64. The \$18,056 in total annual revenues raised from the monthly meter charges would be enough to fund a 25% electricity block rate discount and to retire arrearages for in excess of 40% of Jacksonville's program-eligible customers during the first year of the program at a cost of \$14,526, and (2) to fund a 25% electricity block rate discount for in excess of 60% of Jacksonville's program-eligible customers at an annual cost of \$15,603 in the years thereafter. Exh. GMEU-1 at 10.

65. Assuming a program participation rate of 30%, implementing the meter charges in the AARP Proposal in Jacksonville's service territory would raise sufficient revenue to provide a 25% electricity block rate discount for 35 program-eligible customers at a cost of \$7,092 per year. Exh. GMEU-1 at 9.

66. Assuming a program administration cost of 10% of total electric rate discounts provided, Jacksonville's estimated program administration cost in the first year would range from \$709 (assuming 30% participation) to \$2,364 (assuming 100% participation). Exh. GMEU-1 at 9.

67. Using the design principles from the AARP Proposal, most of the Jacksonville rate classes charged with funding the low-income rates would see rate increases as follows: 1.67% (commercial); 2.2% (residential); and 3.59% (industrial). Exh. GMEU-1 at 10.

68. The cumulative rate impact of the AARP Proposal on Jacksonville's ratepayers would be a rate increase of 2.39%. Exh. GMEU-1 at 10; ¶ 28 note 6, above.

GMEU-Village of Johnson Water & Light Department ("Johnson")

69. In 2008, Johnson served 861 customers: 744 (86%) residential customers; 100 (12%) commercial customers; and 17 (2%) industrial customers. Exh. GMEU-1 at 12.

70. For the year 2008, Johnson collected revenues totaling \$1,865,790: \$676,595 (36%) from residential customers; \$176,197 (9%) from commercial customers; and \$1,012,998 (54%) from industrial customers. Exh. GMEU-1 at 12.

71. In 2008, the average annual adjusted gross income reported by residents in Lamoille County, which is where Johnson's service territory is located, was below \$24,281 — the Vermont average adjusted gross income as determined by the Vermont Department of Taxes. Exh. VEC-Pratt-1.

72. Of Johnson's residential customers, 29% would be eligible for program participation. Exh. GMEU-1 at 11.

73. Based on annualized revenue data from 2008, Johnson's revenues raised from the monthly meter charges in the AARP Proposal would total approximately \$33,392: \$13,392 (40%) from residential customers; \$3,000 (9%) from commercial customers; and \$17,000 (51%)

from industrial customers. Exh. GMEU-1 at 12; ¶ 23 note 5, above.

74. According to AARP's projections, the \$33,392 in total annual revenues raised from the monthly meter charges would be enough to fund a 25% electricity block rate discount and to retire arrearages for at least 20% (\$27,930) — but not enough for 30% (\$41,894) — of Johnson's program-eligible customers during the first year of the program. In the years thereafter, the program revenues would suffice to fund a 25% electricity block rate discount for in excess of 60% of Johnson's program-eligible customers at an annual cost of \$32,375. Exh. GMEU-1 at 11.

75. Assuming a program participation rate of 30%, implementing the meter charges in the AARP Proposal in Johnson's service territory would raise sufficient revenue to provide a 25% electricity block rate discount for 65 eligible customers at a cost of \$14,715 per year. Exh. GMEU-1 at 11.

76. Assuming a program administration cost of 10% of total electric rate discounts provided, Johnson's program administration cost in the first year would range from \$1,471 (assuming 30% participation) to \$4,905 (assuming 100% participation). Exh. GMEU-1 at 11.

77. Using the design principles from the AARP Proposal, the Johnson rate classes charged with funding the low-income rates would see rate increases as follows: 1.68% (industrial); 1.7% (commercial); and 1.98% (residential). Exh. GMEU-1 at 12.

78. The cumulative rate impact of the AARP Proposal on Johnson's ratepayers would be a rate increase of 1.78%. Exh. GMEU-1 at 12; ¶ 28 note 6, above.

GMEU-Village of Ludlow Electric Light Department ("Ludlow")

79. In 2008, Ludlow served 3,693 customers: 3,054 (83%) residential customers; 635 (17%) commercial customers; and 4 (less than 1%) industrial customers. Exh. GMEU-1 at 14.

80. For the year 2008, Ludlow collected revenues totaling \$6,424,708: \$1,855,518 (29%) from residential customers; \$2,571,239 (40%) from commercial customers; and \$1,997,951 (31%) from industrial customers. Exh. GMEU-1 at 14.

81. In 2008, the average annual income reported by residents in Windsor County, which is where Ludlow's service territory is located, was above \$24,281 — the Vermont average adjusted gross income as determined by the Vermont Department of Taxes. Exh. VEC-Pratt-1.

82. Of Ludlow's residential customers, 19% would be eligible for program assistance. Exh. GMEU-1 at 1.

83. Based on annualized revenue data from 2008, Ludlow's revenues raised from the monthly meter charges in the AARP Proposal would total approximately \$78,022: \$54,972 (71%) from residential customers; \$19,050 (24%) from commercial customers; and \$4,000 (5%) from industrial customers. Exh. GMEU-1 at 14; ¶ 23 note 5, above.

84. The \$78,022 in total annual revenues raised from the monthly meter charges would be enough (1) to fund a 25% electricity block rate discount and to retire arrearages for in excess of 80% of Ludlow's program-eligible customers at a cost of \$77,560 during the first year of the program; and (2) to fund a 25% electricity block rate discount for in excess of 80% of Ludlow's program-eligible customers at an annual cost of \$77,560 in the years thereafter. Exh. GMEU-1 at 13.

85. Assuming a program participation rate of 30%, implementing the meter charges in the AARP Proposal in Ludlow's service territory would raise sufficient revenue to provide a 25% electricity block rate discount for 174 eligible customers at a cost of \$26,441 per year. Exh. GMEU-1 at 13.

86. Assuming a program administration cost of 10% of total electric rate discounts provided, Ludlow's program administration cost in the first year would range from \$2,644 (assuming 30% participation) to \$8,813 (assuming 100% participation). Exh. GMEU-1 at 13.

87. Using the design principles from the AARP Proposal, the Ludlow rate classes charged with funding the low-income rates would see rate increases as follows: 0.20% (industrial); 0.74% (commercial); and 2.96% (residential). Exh. GMEU-1 at 14.

88. The cumulative rate impact of the AARP Proposal on Ludlow's ratepayers would be a rate increase of 1.21%. Exh. GMEU-1 at 14; ¶ 28 note 6, above.

GMEU-Village of Lyndonville Electric Department ("Lyndonville")

89. In 2008, Lyndonville served 5,497 customers: 4,733 (86%) residential customers; 719 (13%) commercial customers; and 45 (1%) industrial customers. Exh. GMEU-1 at 16.

90. For the year 2008, Lyndonville collected revenues totaling \$9,291,612: \$4,276,029

(46%) from residential customers; \$1,488,392 (16%) from commercial customers; and \$3,527,191 (38%) from industrial customers. Exh. GMEU-1 at 16.

91. In 2008, the average annual adjusted gross income reported by residents in the Counties of Caledonia and Essex, where Lyndonville's service territory is located, was below \$24,281 — the Vermont average adjusted gross income as determined by the Vermont Department of Taxes. Exh. VEC-Pratt-1.

92. Of Lyndonville's residential customers, 23% would be eligible for assistance. Exh. GMEU-1 at 15.

93. Based on annualized revenue data from 2008, Lyndonville's revenues raised from the monthly meter charges in the AARP Proposal would total approximately \$151,764: \$85,194 (56%) from residential customers; \$21,570 (14%) from commercial customers; and \$45,000 (30%) from industrial customers. Exh. GMEU-1 at 16; ¶ 23 note 5, above.

94. The \$151,764 in total annual revenues raised from the monthly meter charges would be enough (1) to fund a 25% electricity block rate discount and to retire arrearages for in excess of 30% of Lyndonville's program-eligible customers at a cost of \$130,518 during the first year of the program, and (2) to fund a 25% electricity block rate discount for in excess of 50% of Lyndonville's program-eligible customers at an annual cost of \$135,229 in the years thereafter. Exh. GMEU-1 at 15.

95. Assuming a program participation rate of 30%, implementing the meter charges in the AARP Proposal in Lyndonville's service territory would raise sufficient revenue to provide a 25% electricity block rate discount for 327 eligible customers at a cost of \$73,761 per year. Exh. GMEU-1 at 15.

96. Assuming a program administration cost of 10% of total electric rate discounts provided, Lyndonville's estimated program administration cost in the first year would range from \$7,376 (assuming 30% participation) to \$24,587 (assuming 100% participation). Exh. GMEU-1 at 15.

97. Using the design principles from the AARP Proposal, the Lyndonville rate classes charged with funding the low-income rates would see rate increases as follows: 1.28% (industrial); 1.45% (commercial); 1.99% (residential). Exh. GMEU-1 at 16.

98. The cumulative rate impact of the AARP Proposal on Lyndonville 's ratepayers would be a rate increase of 1.63%. Exh. GMEU-1 at 16; ¶ 28 note 6, above.

GMEU-Village of Morrisville Water & Light Department ("Morrisville")

99. In 2008, Morrisville served 3,864 customers: 3,305 (86%) residential customers, as well as 559 (14%) commercial customers. Morrisville served no industrial customers. Exh. GMEU-1 at 18.

100. For the year 2008, Morrisville collected revenues totaling \$6,203,890: \$2,849,276 (46%) from residential customers, and \$3,354,614 (54%) from commercial customers. Exh. GMEU-1 at 18.

101. In 2008, the average annual adjusted gross income reported by residents in Lamoille County, which is where Morrisville's service territory is located, was below \$24,281 — the Vermont average adjusted gross income as determined by the Vermont Department of Taxes. Exh. VEC-Pratt-1.

102. Of Morrisville's residential customers, 18% would be eligible for program assistance. Exh. GMEU-1 at 17.

103. Based on annualized revenue data from 2008, Morrisville's revenues raised from the monthly meter charges in the AARP Proposal would total approximately \$76,260: \$59,490 (78%) from residential customers, and \$16,770 (22%) from commercial customers. Exh. GMEU-1 at 18.

104. The \$76,260 in total annual revenues raised from the monthly meter charges would be enough to fund a 25% electricity block rate discount and to retire arrearage for in excess of 40% of Morrisville's program-eligible customers during the first year of the program at a cost of \$69,865, and (2) for in excess of 50% of Morrisville's program-eligible customers in the years thereafter at an annual cost of \$70,519. Exh. GMEU-1 at 17.

105. Assuming a program participation rate of 30%, implementing the meter charges in the AARP Proposal in Morrisville's service territory would raise sufficient revenue to provide a 25% electricity block rate discount for 178 eligible customers at a cost of \$38,465 per year. Exh. GMEU-1 at 17.

106. Assuming a program administration cost of 10% of total electric rate discounts provided, Morrisville's program administration cost in the first year would range from \$3,846 (assuming 30% participation) to \$12,821 (assuming 100% participation). Exh. GMEU-1 at 17.

107. Using the design principles from the AARP Proposal, the Morrisville rate classes charged with funding the low-income rates would see rate increases ranging from 0.50% (commercial) to 2.09% (residential). Exh. GMEU-1 at 18.

108. The cumulative rate impact of the AARP Proposal on Morrisville's ratepayers would be a rate increase of 1.22%. Exh. GMEU-1 at 18; ¶ 28 note 6, above.

GMEU-Village of Northfield Electric Department ("Northfield")

109. In 2008, Northfield served 1,852 customers: 1,661 (90%) residential customers; 176 (9%) commercial customers; and 15 (less than 1%) industrial customers. Exh. GMEU-1 at 20.

110. For the year 2008, Northfield collected revenues totaling \$3,194,351: \$1,296,165 (40%) from residential customers; \$342,862 (11%) from commercial customers; and \$1,555,324 (49%) from industrial customers. Exh. GMEU-1 at 20.

111. In 2008, the average annual adjusted gross income reported by residents in Washington County, which is where Northfield's service territory is located, was above \$24,281 — the Vermont average adjusted gross income as determined by the Vermont Department of Taxes. Exh. VEC-Pratt-1.

112. Of Northfield's residential customers, 17% would be eligible for program assistance. Exh. GMEU-1 at 19.

113. Based on annualized revenue data from 2008, Northfield's revenues raised from the monthly meter charges in the AARP Proposal would total approximately \$50,178: \$29,898 (60%) from residential customers; \$5,280 (10%) from commercial customers; and \$15,000 (30%) from industrial customers. Exh. GMEU-1 at 20; ¶ 23 note 5, above.

114. The \$50,178 in total annual revenues raised from the monthly meter charges would be enough (1) to fund a 25% electricity block rate discount and to retire arrearages for in excess of 40% of Northfield's program-eligible customers during the first year of the program at a cost of \$47,575, and (2) to fund a 25% electricity block rate discount for in excess of 80% of

Northfield's program-eligible customers at an annual cost of \$48,476 in the years thereafter. Exh. GMEU-1 at 19.

115. Assuming a program participation rate of 30%, implementing the meter charges in the AARP Proposal in Northfield's service territory would raise sufficient revenue to provide a 25% electricity block rate discount for 85 eligible customers at a cost of \$16,526 per year. Exh. GMEU-1 at 19.

116. Assuming a program administration cost of 10% of total electric rate discounts provided, Northfield's estimated program administration cost in the first year would range from \$1,652 (assuming 30% participation) to \$5,508 (assuming 100% participation). Exh. GMEU-1 at 19.

117. Using the design principles from the AARP Proposal, the Northfield rate classes charged with funding the low-income rates would see rate increases as follows: 0.96% (industrial); 1.54% (commercial); and 2.31% (residential). Exh. GMEU-1 at 20.

118. The cumulative rate impact of the AARP Proposal on Northfield's ratepayers would be a rate increase of 1.57%. Exh. GMEU-1 at 20; ¶ 28 note 6, above.

GMEU-Village of Orleans, Inc. Electric Department ("Orleans")

119. In 2008, Orleans served 655 customers: 587 (89%) residential customers; 67 (10%) commercial customers; and 1 (less than 1%) industrial customer. Exh. GMEU-1 at 22.

120. For the year 2008, Orleans collected revenues totaling \$1,478,527: \$449,606 (30%) from residential customers; \$191,920 (13%) from commercial customers; and \$837,001 (57%) from industrial customers. Exh. GMEU-1 at 20.

121. In 2008, the average annual adjusted gross income reported by residents in Orleans County, where Orleans' service territory is located, was below \$24,281 — the Vermont average adjusted gross income as determined by the Vermont Department of Taxes. Exh. VEC-Pratt-1.

122. Of Orleans' residential customers, 31% would be eligible for program assistance. Exh. GMEU-1 at 21.

123. Based on annualized revenue data from 2008, Orleans' revenues raised from the monthly meter charges in the AARP Proposal would total approximately \$13,576: \$10,566 (78%) from

residential customers; \$2,010 (15%) from commercial customers; and \$1,000 (7%) from its industrial customer. Exh. GMEU-1 at 22; ¶ 23 note 5, above.

124. The \$13,576 in total annual revenues raised from the monthly meter charges are projected to be enough to fund a 25% electricity block rate discount and to retire arrearages for at least 20% (\$13,435) — but not enough for 30% (\$20,152) — of Orleans' program-eligible customers during the first year of the program. In the years thereafter, the meter charge revenue would suffice to fund a 25% electricity block rate discount for in excess of 30% of Orleans' program-eligible customers at an annual cost of \$11,498. Exh. GMEU-1 at 21.

125. Assuming a program participation rate of 30%, implementing the meter charges in the AARP Proposal in Orleans' service territory would raise sufficient revenue to provide a 25% electricity block rate discount for 55 eligible customers at a cost of \$10,453 per year. Exh. GMEU-1 at 21.

126. Assuming a program administration cost of 10% of total electric rate discounts provided, Orleans' estimated program administration cost in the first year would range from \$1,045 (assuming 30% participation) to \$3,484 (assuming 100% participation). Exh. GMEU-1 at 21.

127. Using the design principles from the AARP Proposal, the Orleans rate classes charged with funding the low-income rates would see rate increases as follows: 0.12% (industrial); 1.05% (commercial); and 2.35% (residential). Exh. GMEU-1 at 22.

128. The cumulative rate impact of the AARP Proposal on Orleans' ratepayers would be a rate increase of 0.92%. Exh. GMEU-1 at 22; ¶ 28 note 6, above.

GMEU-Town of Readsboro Electric Department ("Readsboro")

129. In 2008, Readsboro served 319 customers: 266 (83%) residential customers; 44 (14%) commercial customers; and 9 (3%) industrial customers. Exh. GMEU-1 at 24.

130. For the year 2008, Readsboro collected revenues totaling \$293,496: \$207,960 (71%) from residential customers; \$43,208 (15%) from commercial customers; and \$42,328 (14%) from industrial customers. Exh. GMEU-1 at 24.

131. In 2008, the average annual adjusted gross income reported by residents in Bennington

County, where Readsboro 's service territory is located, was below \$24,281 — the Vermont average adjusted gross income as determined by the Vermont Department of Taxes. Exh. VEC-Pratt-1.

132. Of Readsboro's residential customers, 19% would be eligible for program assistance. Exh. GMEU-1 at 23.

133. Based on annualized revenue data from 2008, Readsboro's revenues raised from the monthly meter charges in the AARP Proposal would total approximately \$15,108: \$4,788 (31%) from residential customers; \$1,320 (9%) from commercial customers; and \$9,000 (60%) from industrial customers. Exh. GMEU-1 at 24; ¶ 23 note 5, above.

134. The \$15,108 in total annual revenues raised from the monthly meter charges would exceed the sum needed (1) to fund a 25% electricity block rate discount for 100% of Readsboro's program-eligible customers during the first year of the program at a cost of \$10,865, and (2) to fund a 25% electricity block rate discount for 100% of Readsboro's program-eligible customers at an annual cost of \$10,865 in the years thereafter. Exh. GMEU-1 at 23.

135. Assuming a program participation rate of 30%, implementing the meter charges in the AARP Proposal in Readsboro's service territory would raise sufficient revenue to provide a 25% electricity block rate discount for 15 eligible customers at a cost of \$2,963 per year. Exh. GMEU-1 at 23.

136. Assuming a program administration cost of 10% of total electric rate discounts provided, Readsboro's program administration cost in the first year would range from \$296 (assuming 30% participation) to \$987 (assuming 100% participation). Exh. GMEU-1 at 23.

137. Using the design principles from the AARP Proposal, the Readsboro rate classes charged with funding the low-income rates would see rate increases as follows: 2.30% (residential); 3.05% (commercial); 21.26% (industrial). Exh. GMEU-1 at 24.

138. The cumulative rate impact of the AARP Proposal on Readsboro's ratepayers would be a rate increase of 5.15%. Exh. GMEU-1 at 24; ¶ 28 note 6, above.

GMEU-Swanton Village, Inc. Electric Department ("Swanton")

139. In 2008, Swanton served 3,543 customers: 3,128 (88%) residential customers, as well

as 415 (12%) commercial customers. Swanton served no industrial customers. Exh. GMEU-1 at 26.

140. For the year 2008, Swanton collected revenues totaling \$5,661,216: \$2,568,224 (45%) from residential customers, and \$3,092,992 (55%) from commercial customers. Exh. GMEU-1 at 26.

141. In 2008, the average annual adjusted gross income reported by residents in Franklin County, where Swanton's service territory is located, was below \$24,281 — the Vermont average adjusted gross income as determined by the Vermont Department of Taxes. Exh. VEC-Pratt-1.

142. Of Swanton's residential customers, 19% would be eligible for program assistance. Exh. GMEU-1 at 25.

143. Based on annualized revenue data from 2008, Swanton's revenues raised from the monthly meter charges in the AARP Proposal would total approximately \$68,754: \$56,304 (82%) from residential customers, and \$12,450 (18%) from commercial customers. Exh. GMEU-1 at 26; ¶ 23 note 5, above.

144. The \$68,754 in total annual revenues raised from the monthly meter charges would be enough to fund a 25% electricity block rate discount and to retire arrearages for at least 10% (\$64,567) — but not enough for 30% (\$193,700) — of Swanton's program-eligible customers during the first year of the program. In the years thereafter, the meter charge revenues would be enough to fund a 25% electricity block rate discount for in excess of 50% of Swanton's program-eligible customers at an annual cost of \$67,094. Exh. GMEU-1 at 25.

145. Assuming a program participation rate of 30%, implementing the meter charges in the AARP Proposal in Swanton's service territory would raise sufficient revenue to provide a 25% electricity block rate discount for 178 eligible customers at a cost of \$36,597 per year. Exh. GMEU-1 at 25.

146. Assuming a program administration cost of 10% of total electric rate discounts provided, Swanton's program administration cost in the first year would range from \$3,659 (assuming 30% participation) to \$12,199 (assuming 100% participation). Exh. GMEU-1 at 25.

147. Using the design principles from the AARP Proposal, the Swanton rate classes charged with funding the low-income rates would see rate increases ranging from 0.40% (commercial) to

2.19% (residential). Exh. GMEU-1 at 26.

148. The cumulative rate impact of the AARP Proposal on Swanton's ratepayers would be a rate increase of 1.21%. Exh. GMEU-1 at 26; ¶ 28 note 6, above.

IV. Vermont Electric Cooperative, Inc. ("VEC")

149. In 2008, VEC served 37,173 customers: 33,834 (91%) residential customers; 3,198 (8%) small commercial customers; 132 (less than 1%) large commercial customers; and 9 (less than 1%) industrial customers. Exh. VEC-Pratt-2 (revised) at 2.

150. For the year 2008, VEC collected revenues totaling \$61,998,865: \$36,605,361 (59%) from residential customers; \$15,152,118 (24%) from small and large commercial customers; and \$10,241,386 (17%) from industrial customers. Exh. VEC-Pratt-2 (revised) at 2.

151. In 2008, the average annual adjusted gross income reported by residents in six of the eight⁸ counties where VEC's service territory is located, was below \$24,281 — the Vermont average adjusted gross income as determined by the Vermont Department of Taxes. Exh. VEC-Pratt-1.

152. Based on annualized revenue data from 2008, VEC revenues raised from the monthly meter charges in the AARP Proposal would total approximately \$845,952: \$609,012 (72%) from residential customers; \$227,940 (27%) from commercial customers; and \$9,000 (1%) from industrial customers. Exh. VEC-Pratt-2 (revised) at 2.

153. The \$845,952 in total annual revenues raised from the monthly meter charges would provide sufficient revenues to fund a 25% electricity block rate discount and to retire arrearages for in excess of 30% of VEC's program-eligible customers during the first year of the program at a cost of \$707,503, and (2) to fund a 25% electricity block rate discount for in excess of 40% of VEC's program-eligible customers at an annual cost of \$680,493 in the years thereafter. Exh. VEC-Pratt-2 (revised) at 1.

154. Assuming a program participation rate of 30%, implementing the meter charges in the AARP Proposal in VEC's service territory would raise sufficient revenue to provide a 25%

8. These six are the counties of Addison, Lamoille, Franklin, Caledonia, Orleans and Essex, which is where over 70% of VEC's residential customer live. The remaining two counties are Chittenden and Grand Isle.

electricity block rate discount for 1,715 eligible customers at a cost of \$463,972 per year. Exh. VEC-Pratt-2 (revised) at 2.

155. Assuming a program administration cost of 10% of total electric rate discounts provided, VEC's program administration cost in the first year would range from \$61,863 (assuming 30% participation) to \$154,657 (assuming 100% participation). Exh. VEC-Pratt-2 (revised) at 1.

156. Using the design principles from the AARP Proposal, the VEC rate classes charged with funding the low-income rates would see rate increases as follows: 0.09% (industrial); 1.5% (commercial); 1.66% (residential). Exh. VEC-Pratt-2 (revised) at 2.

157. The cumulative rate impact of the AARP Proposal on VEC's ratepayers would be a rate increase of 1.36%. Exh. VEC-Pratt-2 (revised) at 2.

V. Washington Electric Cooperative, Inc. ("WEC")

158. WEC has a largely rural rate base and a small customer base with virtually no large commercial and industrial customers. Taormina pf. at 17.

159. WEC's service territory is mostly rural and is characterized by a large percentage of the state's low-income households, a smaller customer base than CVPS or GMP, and a less favorable mix of classes of ratepayers than either of those two utilities. Taormina pf. at 17.

160. In 2008, WEC served 10,431 customers: 8,623 (83%) residential customers; 1,506 (14%) seasonal residential customers; 290 (2%) commercial customers; 11 (less than 1%) large-power-use customers. Exh. Board-16 at 3.

161. For the year 2008, WEC collected revenues totaling \$10,673,290: \$9,070,499 (85%) from residential customers; \$628,619 (6%) from seasonal residential customers; \$567,895 (5%) from commercial customers; and \$406,326 (4%) from large-power-use customers. Exh. Board-16 at 3.

162. Based on annualized revenue data from 2008, WEC's revenues raised from the monthly meter charges in the AARP Proposal would total approximately \$202,032: \$155,222 (77%) from residential customers; \$27,111 (13%) from seasonal residential customers; \$8,700 (5%) from commercial customers; and \$11,000 (5%) from large-power-use customers. Exh. Board-16 at 3.

163. The \$202,032 in total annual revenues raised from the monthly meter charges would far exceed the \$139,666 needed to fund a 25% electricity block rate discount and to retire arrearages for the 364 program-eligible customers that WEC estimates are likely to enroll during the first year of the program. In the years thereafter, the annual meter charge revenue would far exceed the \$105,387 needed to provide a 25% electricity block rate discount for these 364 program participants. Exh. Board-16 at 3.

164. Assuming a program administration cost of 10% of total electric rate discounts provided, WEC's estimated program administration cost in the first year would be \$9,581. Exh. Board-16 at 3.

165. Using the design principles from the AARP Proposal, the WEC rate classes charged with funding the low-income rates would see rate increases as follows: 1.53% (commercial); 1.71% (residential); 2.71% (large-power-use); 4.31% (seasonal residential). Exh. Board-16 at 3.

166. The cumulative rate impact of the AARP Proposal on WEC's ratepayers would be a rate increase of 1.89%. Exh. Board-16 at 3.

VI. OMYA, Inc. - Vermont Marble Power Division ("VMPD")

167. In 2008, VMPD served 808 customers: 733 (90%) residential customers; 74 (9%) small commercial customers; and 1 (less than 1%) large commercial customer. Exh. VMPD-TAA-2 (revised).

168. For the year 2008, VMPD collected revenues totaling \$964,852: \$539,677(56%) from residential customers; \$271,053 (28%) from small commercial customers; and \$154,120 (16%) from its large industrial customer. Exh. VMPD-TAA-2 (revised).

169. Based on annualized revenue data from 2008, VMPD's revenues raised from the monthly meter charges in the AARP Proposal would total approximately \$16,414: \$13,194 (80%) from residential customers; \$2,220 (14%) from small commercial customers; and \$1000 (6%) from its large commercial customer. Exh. VMPD-TAA-2 (revised).

170. The \$16,414 in total annual revenues raised from the monthly meter charges would be enough to fund a 25% electricity block rate discount and to retire arrearage balances for at least 20% (\$11,011) — but for less than 30% (\$16, 517) — of VMPD's program-eligible customers

during the first year of the program. In the years thereafter, the meter charge funding would suffice to fund a 25% electricity block rate discount in excess of 60% of VMPD's program-eligible customers at an annual cost of \$15,063. Exh. VMPD-TAA-1 (revised).

171. Assuming a program administration cost of 10% of total electric rate discounts provided, VMPD's program administration cost in the first year would range from \$684 (assuming 30% participation) to \$2,282 (assuming 100% participation). Exh. VMPD-TAA-1 (revised).

172. Using the design principles from the AARP Proposal, the VMPD rate classes charged with funding the low-income rates would see rate increases as follows: 0.65% (large commercial); 0.82% (light commercial); and 2.44% (residential). Exh. VMPD-TAA-2 at 2 (revised).

173. The cumulative rate impact of the AARP Proposal on VMPD's ratepayers would be a rate increase of 1.7%. Exh. VMPD-TAA-2 at 2 (revised).